

EXHIBIT B

**Hearing Date: TBD**

**Response Deadline: TBD**

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re: SEARS HOLDING CORPORATION, et al., Debtors.	Bankruptcy No. 18- 23538 (RDD)
VIR VENTURES, INC. AND AMI VENTURES, INC.,  Movants,  v.  SEARS HOLDING CORPORATION,  Respondents.	

**ORDER GRANTING JOINT MOTION OF E-MARKET PLACE SELLERS  
VIR VENTURES, INC. AND AMI VENTURES, INC. TO SET-ASIDE A \$885,896  
RESERVE FROM THE SECOND DISTRIBUTION UNDER THE  
ADMINISTRATIVE EXPENSE CLAIMS CONSENT PROGRAM**

This matter came before the Court on the *EXPEDITED JOINT MOTION OF E-MARKET  
PLACE SELLERS VIR VENTURES, INC. AND AMI VENTURES, INC. TO SET-ASIDE A \$885,896  
RESERVE FROM THE SECOND DISTRIBUTION UNDER THE ADMINISTRATIVE EXPENSE*

*CLAIMS CONSENT PROGRAM* (the “Motion”), and, adequate and sufficient notice of the Motion having been given, and good cause appearing therefor, it is hereby

ORDERED that:

1. The Motion shall be, and hereby is, GRANTED as set forth below;
2. Capitalized terms used but not defined in this Order shall have the same meanings given to them in the Motion; and
3. Before the Second Distribution (or any other distribution) is made under the Administrative Expense Claims Consent Program, the Debtors shall cause to be set aside and reserved (in a segregated, federally-insured account), for the benefit of VIR Ventures, Inc. and AMI Ventures, Inc. (together, the “Claimants”), the sum of \$\_\_\_\_\_ (the “Reserve Amount”). The Debtors shall retain the Reserve Amount until further order of this Court, entered after notice to the Claimants and the Debtors and opportunity for a hearing.

Date: \_\_\_\_\_, 2020

\_\_\_\_\_  
THE HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE